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 6 Attorneys for Defendant, Douglas M. Courson

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

<p>9 UNITED STATES OF AMERICA,    10 Plaintiff,    11 vs.    12 KRISTOPHER LEE DALLMANN,    13 DOUGLAS M. COURSON,    14 FELIPE GARCIA,    15 JARED EDWARD JAUREQUI,        a/k/a Jared Edwards,    16 PETER H. HUBER,    17 YOANY VAILLANT,        a/k/a Yoany Vaillant Fajardo,    18    19 Defendants.</p>	<p>CASE NO.: 2:22-cr-00030-RFB-DJA</p>
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20 **AMENDED STIPULATION AND ORDER TO CONTINUE SENTENCINGS (SECOND**  
**REQUEST)<sup>1</sup>**

21 **IT IS HEREBY STIPULATED** by and between Defendant, **Douglas Courson**, by and  
 22 through his counsel, Paola M. Armeni, Esq. and Austin Barnum, Esq. of the law firm of Clark Hill  
 23 PLLC, Defendant, **Kristopher Lee Dallmann**, by and through his counsel Joshua Tomshek, Esq.  
 24 and Jason F. Carr, Esq. of the Hofland and Tomsheck law firm, Defendant **Felipe Garcia**, by and  
 25 through his counsel William H. Brown, Esq. and Christopher Mishler, Esq., of the Brown Mishler,  
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28 <sup>1</sup> First request for Mr. Vaillant.

1 PPC law firm Defendant, **Jared Edward Jaurequi**, by and through his counsel Russell Marsh,  
2 Esq., of the Wright Marsh & Levy law firm, Defendant **Peter H. Huber**, by and through his  
3 counsel Kathleen Bliss, Esq. of the Kathleen Bliss law firm, and **Yoany Vaillant**, by and through  
4 his counsel Christopher Oram of Christopher Oram Law, the Plaintiff, United States of America,  
5 by and through Jason M. Frierson, United States Attorney, Jessica Olivia, Assistant United States  
6 Attorney, Matthew A. Lamberti, Senior Counsel, and Michael Christin, Esq. that the sentencing  
7 hearings for all defendants currently scheduled for February 3, 2025 for Kristopher Dallmann,  
8 Felipe Garcia, and Douglas Courson, and February 4, 2025 for Jared Jaurequi, Peter Huber, and  
9 Yoany Vaillant be vacated and **rescheduled to the week of April 7, 2025 or April 14<sup>th</sup>-16<sup>th</sup>, 2025.**

10 This Stipulation is entered into for the following reasons:

11 1. On October 21, 2024, this Court appointed Joshua Tomsheck, Esq. as counsel for  
12 Dallmann. (*See* ECF No. 593.) On December 4, 2024, this Court appointed the declarant, Jason  
13 F. Carr, Esq., as co-counsel for Dallmann. (*See* ECF No. 652.)

14 2. Dallmann's counsel believes that the press of business has impaired efforts to  
15 prepare for sentencing and otherwise determine whether any other motions or legal action is  
16 appropriate.

17 3. That press of business includes a capital trial in *State v. Newton*, C-17-322777-1.  
18 The first trial setting in this matter occurred on November 4, 2024, and ended in a mistrial on  
19 November 8, 2024. The trial began again on January 7, 2025. That trial and capital sentencing, if  
20 applicable, will likely last at least another full week.

21 4. Other matters that interfere with preparing for Mr. Dallmann's sentencing in this  
22 complex matter include: A Motion to Dismiss Counts for Extradition Treaty Violations, due on  
23 January 21, 2025 in *State v. Colon*, 23-cr-007257; a hearing in *Bishop-Renteria v. City of*  
24 *Henderson*, C-24-386703-A on January 22, 2025; a Reply Brief due in *State v. Brown*, Nev. Sup.  
25 Ct. No. 88464 on January 24, 2025; and a traverse due on January 30, 2025 in *Kemp v. State*, A-  
26 22-852239-W.

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1       5. Mr. Carr has a hearing in a federal civil case, *Beauregard v. Sampson*, 2:20-cv-02123-  
2 KJD-NJK, set for February 11, 2025.

3       6. Defendants, Kristopher Dallmann, Douglas Courson, Felipe Garcia, Jared Jaurequi,  
4 Peter Huber and Yoany Vaillant have appeared in this case, and are not in custody and, along with  
5 the government, agrees to this continuance. All defense counsel represent that their clients agree  
6 to this continuance.

7       7. All parties believe that it would be most efficient and reasonable for Mr. Dallmann as the  
8 lead defendant to proceed to sentencing first and thereafter the remaining defendants sentencing  
9 to proceed thereafter.

10      8. The additional time requested herein is not sought for purposes of delay.

11      9. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing  
12 hearing for good cause. Good cause exists in this case.

13      10. For all the above-stated reasons, the ends of justice would be best served by a continuance  
14 of the sentencing hearings.

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1       11. This is the second request for a continuance for all defendants except Mr. Vaillant (his first  
 2 request) of the sentencing hearing.

3       Dated this 17<sup>th</sup> day of January 2025.

4 JASON FRIERSON UNITED STATES ATTORNEY DISTRICT OF NEVADA	CLARK HILL PLLC
5 /s/ Jessica Oliva 6 JESSICA OLIVA 7 Assistant United States Attorney 8 Attorneys for Plaintiff, 9 UNITED STATES OF AMERICA	/s/ Paola M. Armeni 10 PAOLA M. ARMENI 11 Attorney for Defendant, 12 DOUGLAS COURSON
13 BRENT S. WIBLE 14 Principal Deputy Assistant Attorney General 15 Head of the Criminal Division  16 /s/ Matthew A. Lamberti 17 MATTHEW A. LAMBERTI 18 Senior Counsel 19 MICHAEL CHRISTIN Trial Attorney 20 United States Department of Justice 21 Attorneys for Plaintiff, 22 UNITED STATES OF AMERICA	BROWN MISHLER, PPC  /s/ William H. Brown 23 WILLIAM H. BROWN 24 CHRISTOPHER MISHLER 25 Attorney for Defendant, 26 FELIPE GARCIA
27 KATHLEEN BLISS LAW  28 /s/ Kathleen Bliss 29 KATHLEEN BLISS 30 Attorney for Defendant, 31 PETER HUBER	WRIGHT MARSH & LEVY  /s/ Russell Marsh 32 RUSSELL MARSH 33 Attorney for Defendant, 34 JARED EDWARD JAUREQUI
35 CHRISTOPHER ORAM LAW  36 /s/ Christopher Oram 37 CHRISTOPHER ORAM 38 Attorney for Defendant, 39 YOANY VAILLANT	

**UNITED STATES DISTRICT COURT**

# DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

CASE NO.: 2:22-cr-00030-RFB-DJA

Plaintiff,

VS.

KRISTOPHER LEE DALLMANN,

DOUGLAS M. COURSON,

FELIPE GARCIA,

9 JARED EDWARD JAUREQUI,  
a/k/a Jared Edwards,

PETER H. HUBER,

YOANY VAILLANT,  
a/k/a Yoany Vaillant Fajardo,

## Defendants.

## **FINDINGS OF FACT, CONCLUSION OF LAW AND ORDER**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby finds that:

## **CONCLUSIONS OF LAW**

Based on the fact that counsel has agreed to a continuance, the Court hereby concludes that:

1. On October 21, 2024, this Court appointed Joshua Tomsheck, Esq. as counsel for Dallmann. (*See* ECF No. 593.) On December 4, 2024, this Court appointed the declarant, Jason F. Carr, Esq., as co-counsel for Dallmann. (*See* ECF No. 652.)

2. Dallmann's counsel believes that the press of business has impaired efforts to prepare for sentencing and otherwise determining whether any other motions or legal action is appropriate.

3. That press of business includes a capital trial in *State v. Newton*, C-17-322777-1. The first trial setting in this matter occurred on November 4, 2024, and ended in a mistrial on

1 November 8, 2024. The trial began again on January 7, 2025. That trial and capital sentencing, if  
2 applicable, will likely last at least another full week.

3       4. Other matters that interfere with preparing for Mr. Dallmann's sentencing in this  
4 complex matter include: A Motion to Dismiss Counts for Extradition Treaty Violations, due on  
5 January 21, 2025 in *State v. Colon*, 23-cr-007257; a hearing in *Bishop-Renteria v. City of*  
6 *Henderson*, C-24-386703-A on January 22, 2025; a Reply Brief due in *State v. Brown*, Nev. Sup.  
7 Ct. No. 88464 on January 24, 2025; and a traverse due on January 30, 2025 in *Kemp v. State*, A-  
8 22-852239-W.

9       5. Mr. Carr has a hearing in a federal civil case, *Beauregard v. Sampson*, 2:20-cv-02123-  
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20 hearing for good cause. Good cause exists in this case.

21      10. For all the above-stated reasons, the ends of justice would be best served by a continuance  
22 of the sentencing hearing.

23      11. This is the second request for a continuance for all defendants except Mr. Vaillant (his first  
24 request) of the sentencing hearing.

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## ORDER

**IT IS HEREBY ORDERED** that the sentencing hearings for all defendants currently scheduled for February 2, 2025, namely Kristopher Dallmann, Felipe Garcia, and Douglas Courson and February 4, 2025, namely Jared Jaurequi, Peter Huber and Yoany Vaillant be vacated and continued to the following days and times in Courtroom 7C:

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

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**RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT COURT JUDGE  
CASE NO.: 2:22-cr-00030-RFB-DJA**